Strathcona Timber Supply Area
Timber Supply Review

Summary of Public Input

BC Ministry of Forests
Campbell River Forest District
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This is a summary of the public input received on the Timber Supply Review in the Strathcona Timber Supply Area. This summary does not assess the feasibility or validity of the input or whether it relates to the clearly defined mandate of the chief forester in the allowable annual cut determination.

104-01781/

Strathcona Timber Supply Area

Background

As part of the review of timber supply in the Strathcona Timber Supply Area (TSA), two opportunities were provided for public input. The first followed release of the Strathcona TSA *Data Package* and *Information Report* in December 1997. The *Information Report* was a non-technical summary of the draft data and management assumptions contained in the *Data Package* which were to be applied in reviewing the timber supply for the Strathcona TSA. A 30-day review period, ending January 28, 1998, was provided for the public to comment on these documents.

On February 24, 1999, the British Columbia Forest Service released the *1999 Strathcona Timber Supply Area Analysis Report* (including a socio-economic analysis) and the *Public Discussion Paper*. The public was encouraged to review and comment on the accuracy of the information in these documents and to provide additional information during the 60-day review period that ended April 26, 1999.

This report summarizes the input received during both public review periods. This information was provided to the chief forester for his consideration when he reviewed the allowable annual cut (AAC) for the Strathcona TSA. The first section of this summary outlines the public review process implemented by the Forest Service, and describes the types of public input received. The second section summarizes the public input in sufficient detail to indicate the range of input received. The original submissions (with personal identifiers removed in accordance with the *Freedom of Information and Protection of Privacy Act*) can be reviewed at the Campbell River Forest District office.

Public Review Process and Response

Campbell River Forest District staff actively solicited public input on the Timber Supply Review in the Strathcona TSA through the following actions:

- direct mail-out of the *Information Report, Data Package, Public Discussion Paper* and *Strathcona Timber Supply Area Analysis Report* to 75 licensees, mills, government agencies, local governments, First Nations, community groups, media and individuals in the Strathcona TSA.
- the *Data Package* and the *Analysis Report* were available at the district office.
- meetings regarding both the *Data Package* and *Analysis Report* were held with representatives from local government, First Nations, the forest industry and other interest groups.
- five open houses were held and were advertised on local radio and in local print media.
- interviews were provided to local media reporters when requested.

As Table 1 shows, more than 115 individuals attended the information sessions and open houses held on the *Strathcona Timber Supply Area Analysis Report*. In addition, during December 1997 and January 1998, Forest District staff reviewed the *Data Package* with approximately 80 individuals, including Kyuquot residents, local media, forest licensees, the Nootka Resource Board, the Campbell River Municipal Council, and the Regional Districts of Comox-Strathcona and Mount Waddington. The Campbell River Forest District also received 10 written submissions on the *Data Package* and 11 submissions on the *Analysis Report* (see Appendix 1).

Activity (No. of participants)	Date
Information sessions	
Local government	
Campbell River Council (25)	Mar. 1/99
Gold River Council (4)	Mar. 2/99
Zeballos Council (4)	Mar. 8/99
Regional District of Comox Strathcona (16)	Mar. 9/99
First Nations	
Ka:'yu:'k't'h'/Che:k:tles7et'h' Nation (3)	Mar. 25/99
Tlowitsis First Nation (2)	Mar. 29/99
Ehattesaht Band Council (3)	Apr. 19/99
Interest Groups	
Licensees (8)	Mar. 3/99
IWA (3)	Mar. 5/99
Nootka Resource Board (20)	Mar. 10/99
Open houses	
Zeballos (8)	Mar. 8/99
Tahsis (5)	Mar. 10/99
Campbell River (2)	Mar. 22/99
Gold River (1)	Mar. 23/99
Kyuquot (12)	Mar. 25/99

Table 1: Participation in public information activities

Public Input

In this section, public input on the information presented in the Timber Supply Review documents for the Strathcona TSA is summarized under the following headings:

- Data Package (and Information Report)
- Timber Supply Area Analysis Report (and Public Discussion Paper)
- Other comments

Data Package

Forest Inventory Factors

Two forest industry submissions refer to the audit of existing volumes currently underway, one suggesting that harvest levels should not be set before completion of the review. The Western Forest Products' submission says merchantable deciduous and pine occurring in mixed species stands should be included in volume estimates.

Land Base Factors

Many comments were received on the assumptions used to define the size of the timber harvesting land base.

Three submissions address the reduction to the land base to protect areas with karst features. Two submissions maintain that removing eight per cent of potential karst areas is excessive, and recommend either a minor removal of these features from the land base (0.5 per cent) or the use of cover constraints to manage karst areas. The third submission says the eight per cent removal will only protect caves and prominent features, and recommends a reduction of 33 per cent until a more intensive survey of karst areas is completed.

Four submissions comment on the land base reductions for environmentally sensitive areas, particularly areas with unstable terrain. Two forest industry submissions question the land base reduction of 40 per cent for areas that are moderately unstable, while a third says cover constraints should be used rather than removing land from the harvesting land base. The fourth submission from an individual says all areas containing class four and five terrain should be removed from the timber harvesting land base, particularly in the Kyuquot supply block with its steep slopes and high rainfall.

Determination of the operable land base is raised in three submissions. TimberWest notes that operability maps include some small areas that are too dispersed to be economically viable in the short term, while MacMillan Bloedel suggests a review of the maps may identify opportunities to harvest some uneconomic timber during market peaks. The third submission recommends reducing the operable land base by 10 per cent, based on this individual's experience of past overestimation.

Three submissions comment on the definition of low-productivity forest types (which are removed from the timber harvesting land base). One submission expresses concern about the regeneration and growth of high elevation stands, noting gaps in the data on tree growth in these areas and the influence of climate change. This individual recommends low productivity be defined as not reaching a height of 28.5 metres by age 120 (rather than 19.5 metres). International Forest Products (Interfor) suggests a sensitivity analysis on reducing the threshold to 300 cubic metre/hectare at age 150. Western Forest Products expresses concern that if old growth site index corrections are not included in the base case, some lower productivity, but otherwise operable, older forests would be excluded because their productivity is underestimated on inventory maps.

Four forest industry submissions express the opinion that deductions from the productive land base for present and especially future roads are too high. They suggest a range from 3.5 to five per cent for future roads is adequate and provide the following rationale:

- cuts and fills exhibit enhanced growth
- roadside planting is commonplace
- use of aerial systems (heli-logging) is increasing
- crowns of bordering trees extend into the space above roads
- current deactivation and rehabilitation requirements return roads and trails to the productive land base

The submissions from TimberWest and MacMillan Bloedel say reductions to the land base to account for riparian reserve and management zones appear low. Doman-Western questions the designation of some streams as fish-bearing (which determines the size of the riparian reserve) and suggests some field checking to verify the deduction from the land base for riparian reserves.

Interfor, Doman-Western and MacMillan Bloedel suggest that rather than removing recreation areas from the timber harvesting land base, they should instead be management zones with forest cover constraints.

Expected Rate of Growth and Productivity

Three forest industry submissions refer to the Old Growth Site Index study and express their preference that the resulting site index adjustments be incorporated into the base case, delaying the Timber Supply Review process if necessary. At a minimum, the site index adjustments should be considered in a sensitivity analysis according to these submissions. A fourth submission questions whether the impacts of the site index changes will apply to green-up ages as well as yields, minimum harvestable ages, etc.

Doman-Western's submission recommends that growth gains from genetically improved seedlings should be incorporated in the analysis, as was done in TFL 19.

Minimum Harvestable Age

Doman-Western's submission says that to maximize yields the minimum harvestable age should be reduced to 60 years or to areas with greater than 350 cubic metres per hectare. A second submission disagrees with the approach of harvesting trees as soon as they reach their highest average rate of growth. This individual says this leads to a focus on maximizing fibre rather than managing forests and all their resources; in addition, this submission says longer rotations should be encouraged to produce high quality, tight-grain wood.

Another individual submission suggests that designation of some forests as "long rotation areas" could be of overall benefit in a minority of situations where the alternatives are the status quo or withdrawal to park status.

Silvicultural Treatments

Interfor expresses the opinion that regeneration delay should be two years for all sites, since planting programs to minimize delays apply to all sites. MacMillan Bloedel's submission questions the methodology used to determine regeneration delay, asking whether surveys recognize growth prior to the regeneration assessment.

An individual submission recommends that licensees be required to reforest areas with the same species as were harvested. Since Sitka spruce cannot be grown (due to the spruce weevil), this individual suggests all spruce stands should be deleted from the timber supply.

Western Forest Products says managed stand densities seem low compared to Ministry of Forests data and suggests that on good sites 900 to 1100 stems per hectare should be left after spacing. TimberWest says it is overly optimistic to assume that 100 per cent of all Douglas-fir stands aged 21 to 60 years are being managed.

The submission from MacMillan Bloedel questions the assumed impacts of commercial thinning on stand yields, and Western Forest Products asks why commercially thinned volumes drop from 40,000 to 30,000 cubic metres per year after 10 years. Another submission suggests that a comprehensive incremental silviculture program should be undertaken to avoid a falldown in 10 to 30 years.

Visual Resources

Five submissions address the management of visually sensitive areas. One submission says visual quality objectives should be restricted to areas of major concern (i.e., areas immediately visible from significant economic features such as resorts) and not areas visible from cruise ships, kayaks, etc. A second submission says viewscapes from the Nootka Island trail should be given retention status, given the economic potential of this trail.

Western Forest Products, Doman-Western and Interfor question whether visual quality management has changed in light of the 1996 letter from the Minister of Forests directing an approach that minimizes timber supply impacts. Interfor makes several recommendations, including a review of visual quality objectives, a reduction in objectives similar to the Sunshine Coast TSA, a subdivision of visual quality zones as was done in the Fraser TSA, and further refinement of objectives by establishing different green-up requirements based on the slope steepness.

Doman-Western suggests alternative silviculture systems should replace removal from the land base for highly sensitive areas. TimberWest notes that the five-metre visual green-up height assumed in the *Data Package* is too low and that seven to eight metres better reflects current practice.

Biodiversity

Three forest industry submissions say that because landscape units and biodiversity emphasis options have not been finalized, they cannot be considered current forest management and should therefore be considered only in a sensitivity analysis, not in the base case analysis.

Wildlife

One submission says the chief forester has an obligation to ensure no species extirpation occurs within this TSA. This individual notes that the proximity of parks and protected areas is not sufficient and states a desire that all native species be maintained throughout their natural range within the Strathcona TSA.

Western Forest Products questions how the Forest Practices Code requirements for biodiversity and riparian areas correlate with the wildlife netdowns noted in the *Data Package*. The company suggests a new method is needed to model habitat management. Doman-Western suggests forest cover requirements should be used for wildlife areas rather than land base removals.

Interfor recommends that deer winter range should be managed in accordance with *Deer and Elk Habitats in Coastal Forests of Southern BC*. Interfor also says the two per cent reduction in the land base to account for wildlife tree patches is unnecessary because these requirements can be met outside harvesting areas.

Western Forest Products' submission says merchantable deciduous and pine occurring in mixed species stands should contribute to stand-level biodiversity requirements.

Forest Cover Requirements

Doman-Western Lumber's submission says a four-pass harvest system is not required to meet forest cover requirements because the effect of environmentally sensitive leave areas, forest ecosystem networks and inoperable areas ensures that 83 per cent of the operable land base can be harvested in two passes. Western Forest Products suggests that green-up heights between adjacent cutblocks be modelled at two metres to reflect anticipated changes in regulations.

Unsalvaged Losses

One submission says the estimate of unsalvaged losses is too low, given the devastating windstorm that hit Vancouver Island early in this century and therefore the potential for a periodic event of that magnitude.

Socio-Economic Issues

Two submissions note that employment and communities outside the Strathcona TSA must also be considered in the analysis. Doman-Western says the *Information Report* only reports the number of jobs within the timber supply area and this is misleading. MacMillan Bloedel says the assumption of 30 to 50 indirect/induced jobs per 100 direct jobs appears low and notes that 60 was used in the 1995 socio-economic analysis. Western Forest Products says timber objectives need to be clearly defined, and current and future employment levels set.

An individual submission questions the use of data from the 1991 census and says it's important to look at trends, such as increasing tourism jobs and decreasing forestry jobs due to market forces and new technology. This submission says the productivity of the forest must determine the size and health of dependent communities; communities cannot dictate what a forest must produce.

MacMillan Bloedel says the socio-economic analysis should examine trade-offs between different management options, not just the base case.

Strathcona Timber Supply Area

Timber Supply Area Analysis Report

Forest Inventory Factors

In its submission, the Sierra Club of BC notes that the timber supply analysis conducted by licensees in 1995 suggested timber volumes in the Loughborough Supply Block may have been overestimated. Further, the Club says that in the rationale statement accompanying the 1996 AAC determination, the chief forester indicated this discrepancy should be resolved. The Sierra Club says it appears this has not been done.

The Sierra Club also notes that the actual harvest in the Strathcona TSA has been less than the AAC for the past five years. The organization says this is long enough to conclude that past timber supply analyses have overestimated timber supply.

Land Base Factors

In order to understand the impact of new parks and protected areas, Interfor requests a detailed accounting of the area removed from the timber harvesting land base, both in this timber supply review and in the previous one.

Biodiversity and Wildlife

In its submission, the Sierra Club expresses the opinion that non-timber values are not being adequately protected because the government has limited the timber supply impacts of protecting biodiversity or identified wildlife species to four per cent and one per cent respectively. The Sierra Club says the Identified Wildlife Management Strategy is now being implemented and its impact, although minor, should be considered in the timber supply analysis.

Visually Sensitive Areas

Interfor questions what the Forest Service has done in consideration of the chief forester's direction with respect to mitigating the timber supply impacts of managing for visual quality.

The Sierra Club and the Ministry of Small Business, Tourism and Culture both express concern about the reduction in visual standards. They maintain that the increasing economic contribution of tourism will force higher standards to be reinstated, causing future hardship to the forest industry. The ministry says reducing visual constraints on harvesting gives the impression there is more harvestable fibre available than is the case, if the interests of the tourism sector are accounted for. In addition, the Sierra Club says decreasing visual standards will likely jeopardize one of the main drivers of economic growth in this timber supply area: the quality of the local environment.

Socio-Economic Impacts

An individual submission says the village of Kyuquot is in a crisis due to the loss of forestry activity in the area, including the collapse of Forest Renewal BC funding for 1999/2000. This individual says First Nations people are particularly hard hit and face a long stretch of unemployment.

The Ministry of Small Business, Tourism and Culture says a healthy forest sector is important, but too high a harvest level will negatively impact the tourism industry, especially nature-based or eco-tourism.

The Sierra Club points out in its submission that from 1991-1996 the unemployment rate in the Strathcona TSA decreased, as did the annual cut. The organization says this means that changes in employment are not proportional to timber cutting jobs. In fact, they say a reduced harvest would bring a decrease in direct forestry jobs in the short term, but indirect and induced jobs would continue to be supported by overall increasing economic activity and diversity. Overall job increases can be expected due to an expanding population, according to the Sierra Club's submission.

The Village of Tahsis says the socio-economic analysis should include more information on local community impacts from changes in timber supply. With more detailed statistical analysis, the village says this report could be used as a template for the survival of many small single-industry communities currently in crisis.

First Nations

In their submission, the Ehattesaht Tribe express their concern about further erosion of the AAC for Hecate Logging Ltd.'s forest licence. The submission says this joint venture operation requires an annual harvest of about 100,000 cubic metres, and points out the importance of this forest licence to the Tribe's economic future. While acknowledging the need for a sustainable harvest level, the Ehattesaht Tribe recommends that tenure holders with AACs less than 100,000 cubic metres be exempt from further reductions.

In addition to the above submission, various issues have been identified in meetings and discussions with First Nations representatives in the Strathcona TSA. The issues raised include:

- maintaining sustainable and separate levels of cut by traditional territory
- establishing a separate harvest level for the Kyuquot Supply Block
- sustaining and expanding levels of employment and forest tenure opportunities
- ensuring access to forest resources, especially large-diameter cedar, for traditional activities such as carving canoes, basket making and houseposts
- completing a comprehensive inventory of traditional and archaeological resources
- ensuring treaty interests are not compromised by current harvest levels

Other Comments

Many submissions commented on factors or issues other than those specifically covered by Timber Supply Review documents. These comments are summarized in this section.

Timber Supply Review Process

One individual submission says the Ministry of Forests is too easily persuaded by people who don't make their living from the forests and expresses a desire for a decision based on fact, not on pleasing 'tree huggers'.

Another individual says the Timber Supply Review should be halted until landscape units from the Vancouver Island Resource Targets (VIRT) process are approved, as this would change the approach to green-up and wildlife tree patches. Western Forest Products and Doman-Western suggest the need for sensitivity analyses of draft VIRT biodiversity emphasis options and management regimes. Western Forest Products also says the concepts and approach used in the Forest Alliance report examining the Strathcona TSA should be referenced and incorporated into this Timber Supply Review.

Two forest industry submissions recommend sensitivity analyses to measure the impact of the following on timber supply: partial harvesting systems, inclusion of uneconomic/low productivity types (to be harvested at market peaks), silvicultural strategies to increase tree growth (e.g. fertilization), and inclusion of a portion of the inoperable areas.

The Sierra Club acknowledges that the Timber Supply Review process can address non-timber values only to a limited degree, given that the provincial government has taken key considerations out of the hands of the Forest Service (e.g., by waiving biodiversity provisions of the Forest Practices Code for hundreds of years, setting limits on timber supply impacts of protecting wildlife, etc.). The organization maintains that GIS-based spatial analysis is still

needed, especially with the concentration of logging in the Kyuquot block. In general, the Sierra Club is of the opinion that the available timber supply is being exaggerated by assumptions used in the analysis (such as reduction in minimum harvestable ages, lower thresholds for low productivity, and inclusion of some deciduous species).

The Ministry of Small Business, Tourism and Culture concurs with the need for GIS-based spatial analysis.

Harvest Levels

One individual submission suggests that temporarily withholding a minor portion of the AAC until more buoyant markets exist may be beneficial and result in overall revenue enhancement. Another says falldowns should be phased to coincide with natural attrition rates and remaining Forest Renewal BC funds should be used to mitigate AAC reductions.

The Sierra Club submission says that with a 25 per cent reduction in the size of the timber harvesting land base, a reduction in harvest levels would be expected. They say this hasn't occurred because of a reduction in visual quality standards and the weakening of the Forest Practices Code. In the Sierra Club's opinion, the base case harvest forecast grossly overstates what could be considered a sustainable rate of cut for this portion of Vancouver Island. The organization says the AAC must be set well below 1.25 cubic metres per year if there is to be any hope of a smooth transition to a sustainable forest sector as part of a healthy, diversified mid-Island economy.

Hecate Logging Ltd. expresses concern about the 21 per cent reduction in the AAC for their Forest Licence that has occurred over the past decade. The company says the repeated reductions threaten to make their operation uneconomical and notes the negative socio-economic impact this would have on their joint venture partner, the Ehattesaht First Nation. Hecate Logging recommends that any future AAC reductions be taken from tenures with AACs exceeding 100,000 cubic metres per year and/or from the Small Business Forest Enterprise Program. In addition, the company suggests that the alternative harvest flow shown in Figure 5 of the *Public Discussion Paper* be adopted.

With regard to the distribution of the AAC, Interfor requests reporting that would highlight the harvesting activities expected from each of the three supply blocks.

A submission from the District of Campbell River expresses concern about the cumulative 28 per cent reduction over five years that would result if the base case forecast were adopted as the AAC. The district says this reduction would eliminate the opportunity for a community forest tenure and negatively impact the existing harvesting and processing industry in the area. In addition, such a reduction would affect the investment viability and business climate of Campbell River and the Strathcona TSA. The submission says what is needed is expeditious access to standing timber and what is referred to as non-market wood.

Kyuquot Supply Block

Several submissions comment on the future management of the Kyuquot supply block. Doman-Western is of the opinion that the Kyuquot block should be subject to a separate timber supply analysis, as requested by the Nootka Resource Board. The submission from the Village of Tahsis expresses concern about the implications of the base case harvest projection on western communities and requests consideration of managing the Kyuquot block as a separate entity to encourage establishment of a west coast economy based on sustainable harvest levels.

Two other submissions express concern about overharvesting in this block and suggest an orderly transition to the long-term harvest level in the Kyuquot block, possibly through use of a partitioned cut. One individual says it is not good forestry or good environmental practice to harvest West Coast old-growth at unsustainable rates to balance age classes in other areas of the timber supply area.

Submissions received by the Campbell River Forest District

Submissions received on the Data Package

Industry
TimberWest Forest Ltd.
MacMillan Bloedel Ltd.
Doman-Western Lumber Ltd.
International Forest Products Ltd.
Western Forest Products Ltd.

Local government
John Chittick, Councillor, Town of Port McNeill

General public
Three response forms
One individual submission

Submissions received on the Timber Supply Area Analysis Report

Local government
Director Tom Pater, Electoral Area G, Regional District of Comox-Strathcona
Paul Edgington, CAO, Village of Tahsis
Tom McCrae, Mayor, Village of Tahsis
District of Campbell River, Mayor and Council

Interest groups
Sierra Club of BC

First Nations
Ehattesaht Tribe

Government agencies
Ministry of Small Business, Tourism and Culture

Industry
International Forest Products Ltd.
Hecate Logging Ltd.

General public
Two individual submissions